

### **REMARKS**

Applicants submit these remarks in response to the Office Action dated January 14, 2005 ("Office Action"). As indicated on Paper 20050712, the date of the Office Action was reset to run from the date of that paper (i.e., July 18, 2005). Accordingly, the three-month deadline for filing a response falls on October 18, 2005. Therefore, Applicants believe that this response is being timely filed. In the event that Applicants are incorrect in their assumption, please charge any additional fee to Deposit Account No. 23-2415.

### **CLAIMS**

Claims 2 and 9 have been cancelled and the features thereof have been incorporated in independent Claims 1 and 8. Claims 5 and 12 have been rewritten in independent form. Claims 3 and 11 have been revised to recite the correct dependency. The claims were also revised to explicitly recite mapping a set of  $n$ -dimensional input patterns on an  $m$ -dimensional space for display of said patterns. These revisions are clearly supported by the specification and are explicitly added to the claims for clarification.

All claim amendments are based on the claims already of record in the application. Moreover, the claim amendments are presented to simplify the issues before the Examiner and are believed to place the subject application in condition for allowance. Entry of the claim amendments is respectfully requested.

### ***The Rejection of Claims 1-14 under 35 U.S.C. § 112 Second Paragraph Should Be Withdrawn***

Claims 1-14 were rejected as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. The Examiner queries as to whether  $m$  and  $n$  are integer values. Applicants submit that the specification clearly indicates that  $m$  and  $n$  are integer values and are not real numbers. Applicants never made a representation that  $m$  or  $n$  are not integer numbers. Moreover, the attempt in the Office Action to assign a limit on

$m$  and  $n$  is improper. Based on the requirement  $m < n$  those of skill in the art can easily ascertain the meets and bounds of the claims. Withdrawal of the rejection is in order and is respectfully requested.

***The Rejection of the Claims under 35 U.S.C. § 101 Should Be Withdrawn***

Claims 1-14 were rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. In order to expedite prosecution of the subject application, the claims have been revised to explicitly recite mapping a set of  $n$ -dimensional input patterns on an  $m$ -dimensional space for display of said patterns. It is respectfully submitted that the claims as now presented clearly set forth patentable subject matter. Applicants respectfully request withdrawal of the rejection under § 101 of the Patent Statute.

***The Rejection of Claims 1-14 under 35 U.S.C. § 102 (b) Should Be Withdrawn***

Claims 1-14 were rejected as being anticipated by Pao (U.S. Patent Number 5,734,796). For the reasons discussed herein, Applicants respectfully disagree.

***Pao fails to teach or suggest “partitioning  $T$  into  $c$  disjoint clusters  $C_j$  based on a distance function  $d$ ”***

*Pao* does not suggest much less disclose each feature of the presently claimed invention. For example, *Pao* does not suggest “partitioning  $T$  into  $c$  disjoint clusters  $C_j$  based on a distance function  $d$ .” Contrary to the assertion on Page 6 of the Office Action, neither Figure 1b and the description thereof in *Pao* nor any other portion of *Pao* mentions partitioning  $T$  into disjoint clusters, much less doing so based on a distance function  $d$ .

Because *Pao* fails to teach or suggest the steps of “partitioning  $T$  into  $c$  disjoint clusters  $C_j$  based on a distance function  $d$ ,” Applicants respectfully submit that *Pao* does not anticipate or render obvious Claims 1, 3-8 and 10-14. Withdrawal of the rejection based on *Pao* is therefore in order and such favorable action is respectfully requested.

**CONCLUSION**

Applicants believe that for the reasons set forth above, Claims 1, 3-8 and 10-14 are in condition for allowance and respectfully request prompt and favorable action. Please charge any fee due in connection with this submission to Deposit Account No. 23-2415.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (858) 350-2337.

Respectfully submitted,

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A handwritten signature in cursive script, appearing to read "Samir Elamrani".

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Dated October 18, 2005